

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SEMIRA IBRAHIM,	)	
	)	
Plaintiff,	)	Case No.:
	)	
vs.	)	PLAINTIFF’S COMPLAINT
	)	AND DEMAND FOR JURY TRIAL
LAW OFFICES OF JOEL CARDIS, LLC,	)	
	)	
Defendant.	)	

**VERIFIED COMPLAINT**

SEMIRA IBRAHIM, (“Plaintiff”), through the undersigned counsel, ALEX SIMANOVSKY & ASSOCIATES, LLC, alleges the following against LAW OFFICES OF JOEL CARDIS, LLC, (“Defendant”):

**INTRODUCTION**

1. Plaintiff’s Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. (FDCPA).

**JURISDICTION AND VENUE**

2. Jurisdiction of this court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy.”

3. Defendant conducts business in the state of Georgia, and therefore, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. 1391(b)(1).

5. Declaratory relief is available pursuant to 28 U.S.C. 2201 and 2202.

**PARTIES**

6. Plaintiff is a natural person residing in Suwanee, Gwinnett County, Georgia.

7. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 U.S.C. 1692a(5).

8. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiff.

9. Defendant is a national company, with its corporate office located at: Law Offices of Joel Cardis, LLC, 2006 Swede Road, Suite 100, East Norriton, Montgomery County, Pennsylvania 19401.

10. Defendant, in the ordinary course of business, regularly, on behalf of itself or others, engages in debt collection.

**FACTUAL ALLEGATIONS**

**A. DEBT**

11. Plaintiff incurred a financial obligation in the approximate amount of \$1,089.00 (the “Debt”) to Dr. Ashley Starnes (the “Creditor”) in connection with a dental procedure.

12. The Debt arose from services allegedly provided by the Creditor which were primarily for family, personal or household purposes and which meets the definition of a “debt” under 15 U.S.C. §1692a(5).

13. The debt was incurred on or about August 2009.

14. The Debt was purchased, assigned or transferred to the Law Offices of Joel Cardis, LLC for collection, or the Law Offices of Joel Cardis, LLC was employed by the Creditor to collect the Debt.

15. The Defendant attempted to collect the Debt and, as such, engaged in “communications” as defined in 15 U.S.C. §1692a(2).

**B. HARASSMENT AND ABUSIVE TACTICS**

16. Defendant constantly and continuously places collection calls to Plaintiff seeking and demanding payment for the alleged debt.

17. Defendant calls Plaintiff from telephone number 877-444-4655 seeking and demanding payment for the alleged debt.

18. Defendant began calling on or about July 2010.

19. Defendant made numerous calls to Plaintiff’s place of employment, Walmart, at 770-921-0228.

**COUNT I**  
**DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT**

20. Defendant violated the FDCPA based on the following:

- a.) Defendant violated §1692c(a)(3) by repeatedly contacting Plaintiff at Plaintiff’s place of employment even though Defendant knew that Plaintiff’s employer prohibits the consumer from receiving such communications.
- b.) Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt.
- c.) Defendant violated §1692c(a)(1) of the FDCPA by communicating with Plaintiff at such place and time known or which should have been known to be inconvenient to Plaintiff.

WHEREFORE, Plaintiff, SEMIRA IBRAHIM, respectfully requests judgment be entered against Defendant, LAW OFFICES OF JOEL CARDIS, LLC, for the following:

- a. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,
- b. Statutory damages pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k,
- c. Actual damages,
- d. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k
- e. Any other relief that this Honorable Court deems appropriate.

**DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that Plaintiff, SEMIRA IBRAHIM, demands a jury trial in this case.

This 10th day of September, 2010.

RESPECTFULLY SUBMITTED,

ALEX SIMANOVSKY & ASSOCIATES LLC

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/s/ Alex Simanovsky

Alex Simanovsky, Esq.  
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